

1 UNITED STATES BANKRUPTCY COURT  
2 EASTERN DISTRICT OF NEW YORK

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4 In re:

Case No. 1 - 23 - 43211

5 Nailah Bourne and Gladstone Junior Robinson,

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Chapter 7

7 Debtor.

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9 Nailah Bourne,

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11 Plaintiff,

12

13 -against-

Adv. Proc. No.

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15 CrossCountry Mortgage, LLC and McMichael

16 Taylor Gray, LLC

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19 Defendants,

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22 **CLAIM; AND REDRESS FOR RELIEF**

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25 Nailah Bourne, Plaintiff, filing this claim for relief against CrossCountry Mortgage, LLC and  
26 McMichael Taylor Gray, LLC,(hereinafter, "Defendants"), seeking relief as follows: Recovery of  
27 Money; and Recovery of Property; and Validation of Lien; and Removal of all Liens Known and  
28 Unknown; and Injunctive Relief; and Declaratory Judgment; and Determination of Removed  
29 action (SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF RICHMOND  
30 135121/2022):

- 31 1. The Bankruptcy Court has jurisdiction to determine this matter because Plaintiff's
- 32 Bankruptcy case is currently before this court;
- 33 2. The Plaintiff, Nailah Bourne, is domiciled at 125 Beverly Avenue Staten Island New
- 34 York, 10301;
- 35 3. The Defendant CrossCountry Mortgage, LLC, place of business is 1 Corporate Drive
- 36 Suite 360 Lake Zurich, IL 60047,[Diversity of Citizenship];
- 37 4. The Defendant McMichael Taylor Gray, LLC, place of business is 3550 Engineering
- 38 Drive Suite 260 Peachtree Corners, GA 30092-2871,[Diversity of Citizenship];
- 39 5. Defendants CrossCountry Mortgage, LLC and McMichael Taylor Gray, LLC, filed a
- 40 Notice of Appearance,(Docket No. 8, in this case);

6. Defendants have not filed US District Bankruptcy, Official Form 410 in this case;
7. Defendants did not attend Plaintiffs 341 Meeting of Creditors;
8. Defendants continued with the foreclosure and sale of Plaintiffs home after being notified of the petition for relief; and automatic stay(Docket No. 27 in this case);
9. Defendants continued to mail Plaintiffs debt collector letters after being notified of the petition for relief; and automatic stay(Docket No. 27 in this case);
10. Plaintiff alleges that Defendants worked in concert to violate Public Law 95-598, §362; and this courts Automatic Stay; and are injuring Plaintiff by continuing the sale; and possession of Plaintiffs home, which is listed in Plaintiffs Schedule C;

WHEREFORE, Plaintiff(s) respectfully request that this Court declare that Defendants violated Public Law 95-598, §362, as well as all applicable Federal Bankruptcy Laws; and grant Plaintiff the real property/home listed in Schedule C, unencumbered by any Rights, Title, Interest or Liens of and by Defendants; and a Permanent Injunction against Defendants; and a Declaratory Judgment against Defendants; and a Determination of a Removed Action, aforementioned; and Monetary and Punitive Relief in the amount of \$7, 777, 777.77.

Respectfully and with explicit reservation of all unalienable rights  
Without prejudice and without recourse to any unalienable rights  
To be held harmless and with clean hands

:Nailah-Femi :Bourne

*By: Nailah-Femi Bourne Beneficiary*  
Plaintiff/Beneficiary

:Gladstone :Robinson Jr

*By: Gladstone Robinson Jr*  
Attorney-In-Fact/Subrogor

[TEACHINGPRNCPLS@gmail.com](mailto:TEACHINGPRNCPLS@gmail.com)

347-743-1479

Date:Month, Eleventh Day, Twenty First Year, Two Thousand Twenty Third